

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Debra Hicks, Debtor**

**Case No. 20-51188-KMS  
CHAPTER 13**

**RESPONSE**

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Motion to Modify Plan (dk # 48) as follows:

1. Debtor commenced this case on by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor is a below median debtor. Debtor wishes to reduce the terms of her bankruptcy from 60 months to 58 months.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Attorney for Debtor

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**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on June 26, 2025, to:

By Electronic CM/ECF Notice:  
David Rawlings  
U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.